



COMMONWEALTH OF MASSACHUSETTS
EXECUTIVE OFFICE OF ENERGY & ENVIRONMENTAL AFFAIRS
DEPARTMENT OF ENVIRONMENTAL PROTECTION

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September 25, 2009

Joseph Becker
Covanta Haverhill Associates
100 Recovery Way
Haverhill, MA 01835

Re: Covanta Haverhill Associates BWP SW 16 Permit Modification. Class II Recycling Program - Facility ID# 132291 – Final Permit

Dear Mr. Becker:

Attached is Covanta Haverhill's Approved Class II Recycling Program permit modification under 310 CMR 19.300. MassDEP issued a Provisional Permit on August 26, 2009 pursuant to the provisions of Massachusetts General Laws (M.G.L.) Chapter 111, Section 150A and 310 CMR 19.000, and the "Solid Waste Management Facility Regulations". Pursuant to the provisions of 310 CMR 19.037 (4)(a), the MassDEP accepted written comments on this Permit for twenty-one (21) days from the date of issuance. Covanta Haverhill submitted several comments on the Provisional Permit and below is a summary of how MassDEP addressed these comments.

1. Covanta asked that the initial training of the Waste Ban Compliance Professional be open to permittee staff. MassDEP did not address this in the permit modification but welcomes the attendance of permittee staff at the initial and all future waste ban trainings.
2. Covanta requested that the deadline for submittal of the waste characterization methodology be set for November 1, 2009, or 30 days after MassDEP finalizes the guidance, whichever is later. MassDEP addressed this issue in Condition #12 in the permit modification. MassDEP did not accept Covanta's request to extend the deadline for submitting a final report for the initial waste characterization study.

Other relevant changes to the Provisional Permit modification are listed below.

1. MassDEP added a condition (Condition #4) outlining MassDEP's right to inspect the facility.



2. MassDEP changed Condition #11 (D) to reflect the need for legally required work breaks for the Waste Ban Compliance Professional.
3. Minor changes to Attachment 1 were made to reflect that the TIME OUT and HAULER ACCT NUM may not always be known.
4. An addition to Attachment 2 was made to include analysis by failed material in the Quarterly Comparative Analysis Report.

MassDEP appreciates Covanta's cooperation during the permitting process. If you have any additional questions, please contact me at 617-292-5988.

Sincerely,

Greg Cooper
Deputy Division Director
BWP - Consumer & Transportation Programs